

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re:

BRAC GROUP, INC. (f/k/a Budget Group, Inc.),
Reorganized Debtor.

Chapter 11 Case No. 02-12152 (RB)

RE: D.I. 5315, 5325, 5332, 5480

MICHAEL BELGRAVE,

Appellant,

v.

THE PLAN ADMINISTRATOR FOR BRAC
GROUP, INC.,

Appellee.

Civil Action No. 05-319 (KAJ)

NOTICE OF COMPLETION OF BRIEFING REGARDING
(i) THE PLAN ADMINISTRATOR'S MOTION TO DISMISS APPEAL AND
(ii) THE PLAN ADMINISTRATOR'S MOTION TO STAY MEDIATION

PLEASE TAKE NOTICE that the submission of motions and pleadings relating to (i) The Plan Administrator's Motion to Dismiss Appeal and (ii) The Plan Administrator's Motion to Stay Mediation Pending Decision on the Plan Administrator's Motion to Dismiss Appeal (collectively, the "Motions") is now complete and the Motions are ripe for the Court's consideration. The following pleadings are relevant to the Court's consideration of the Motions:

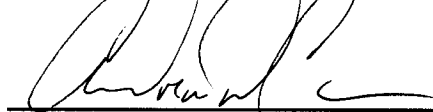
1. The Plan Administrator's Motion to Dismiss Appeal (D.I. 8) (filed May 27, 2005).
2. The Plan Administrator's Motion to Stay Mediation Pending Decision on the Plan Administrator's Motion to Dismiss Appeal (D.I. 7) (filed May 27, 2005).

3. Appendix to the Plan Administrator's Motion to Dismiss Michael Belgrave's Appeal and Motion to Stay Mediation Pending Decision on the Plan Administrator's Motion to Dismiss Appeal (D.I. 9) (filed May 27, 2005).

4. Michael Belgrave's Response to Plan Administrator's Motion to Dismiss & Motion to Stay Mediation Regarding the Appeal of the Order & Amended Order Approving Eighteenth Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3003 and 3007 and Local Rule 3007-1 (D.I. 10) (filed June 3, 2005).

5. The Plan Administrator's Reply to Michael Belgrave's Response to the Plan Administrator's Motion to Dismiss Appeal and Motion to Stay Mediation (D.I. 13) (filed June 17, 2005).

ASHBY & GEDDES, P.A.



William P. Bowden (I.D. #2553)
Gregory A. Taylor (I.D. #4008)
Andrew D. Cordo (I.D. #4534)
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—and—

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Dated: June 20, 2005
158665.1

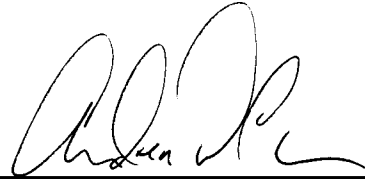
Counsel to the Plan Administrator

CERTIFICATE OF SERVICE

I, Andrew D. Cordo, hereby certify that, on June 20, 2005, I caused one copy of the foregoing **Notice of Completion Regarding (i) The Plan Administrator's Motion to Dismiss Appeal and (ii) The Plan Administrator's Motion to Stay Mediation** to be served upon the persons listed below in the manner indicated.

BY U.S. MAIL and FEDERAL EXPRESS

Michael Belgrave
311 Taft Ave.
Cleveland, TX 77327

A handwritten signature in black ink, appearing to read 'Andrew D. Cordo', is written over a horizontal line.

Andrew D. Cordo (I.D. #4534)